

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

February 28 2024  
Ravi Subramanian, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

ROBEL KELETA GOITOM,  
Defendant.

NO. **CR 24 - 040 RSL**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Unlawful Possession of a Firearm)**

On or about October 1, 2023, in King County, within the Western District of  
Washington, ROBEL KELETA GOITOM, knowing he had been convicted of the  
following crimes punishable by a term of imprisonment exceeding one year:

- i. *Felon in Possession of a Firearm and Bank Fraud*, in the Western  
District of Washington, under case number CR17-132-JCC, on or about  
July 17, 2018; and

ii. *Unlawful Possession of a Firearm in the Second Degree* and three counts of *Felony Harassment*, in the King County Superior Court, under case number 19-1-05963-6, on or about December 17, 2021;

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is: a Glock Model 19 9mm semi-automatic pistol, that had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

## FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, ROBEL KELETA GOITOM, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms or ammunition that were used or involved in the offense.

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1       **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendant,

- 3           a.     cannot be located upon the exercise of due diligence;  
4           b.     has been transferred or sold to, or deposited with, a third party;  
5           c.     has been placed beyond the jurisdiction of the Court;  
6           d.     has been substantially diminished in value; or,  
7           e.     has been commingled with other property which cannot be divided  
8                 without difficulty,


9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

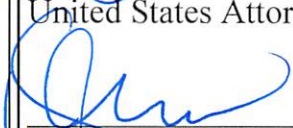
12  
13                   A TRUE BILL:

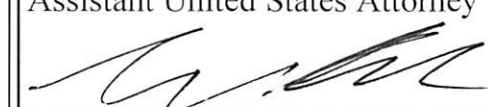
14                   DATED: 2/28/24

15                   *Signature of Foreperson redacted pursuant*  
16                   *to the policy of the Judicial Conference of*  
17                   *the United States.*

18                   \_\_\_\_\_  
19                   FOREPERSON

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19 \_\_\_\_\_  
20 TESSA M. GORMAN  
21 United States Attorney

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22 \_\_\_\_\_  
23 TODD GREENBERG  
24 Assistant United States Attorney

24   
25 \_\_\_\_\_  
26 ERIKA J. EVANS  
27 Assistant United States Attorney